

Testimony of Diane Cameron

Montgomery County Planning Board Hearing on the “Creekside at Cabin Branch” proposed site plan

Thursday, September 9, 2021

The Ten Mile Creek Limited Master Plan Amendment (“Master Plan”), approved by the Montgomery County Council in 2014, is grounded in science and is our government’s response to citizens’ demand for clean water protection. As a Board member of the Friends of Ten Mile Creek, I join with my colleagues in opposing this destructive site plan proposal.

The proposed Pulte site plan, called “Creekside at Cabin Branch,” would result in imperviousness levels far exceeding 6 percent in the most sensitive subwatersheds (as high as 6.9% in LSTM 110 and 12.8% in LSTM 111); as such it is contrary to the Master Plan and the Planning Board must reject it.

According to the Master Plan, the 6% limit on imperviousness in these two most-sensitive subwatersheds of Ten Mile Creek is a strict limit – a ceiling – not a mere “goal to try to reach.” In order to follow the science and enforce the Master Plan, imperviousness must stay under 6% in each of the two subwatersheds.

Imperviousness is important in two ways: it directly harms healthy streams as documented by Scott Goetz and others, and it’s an indicator of the damages wrought by the *Urban Stream Syndrome* – the urbanization of rural watersheds.

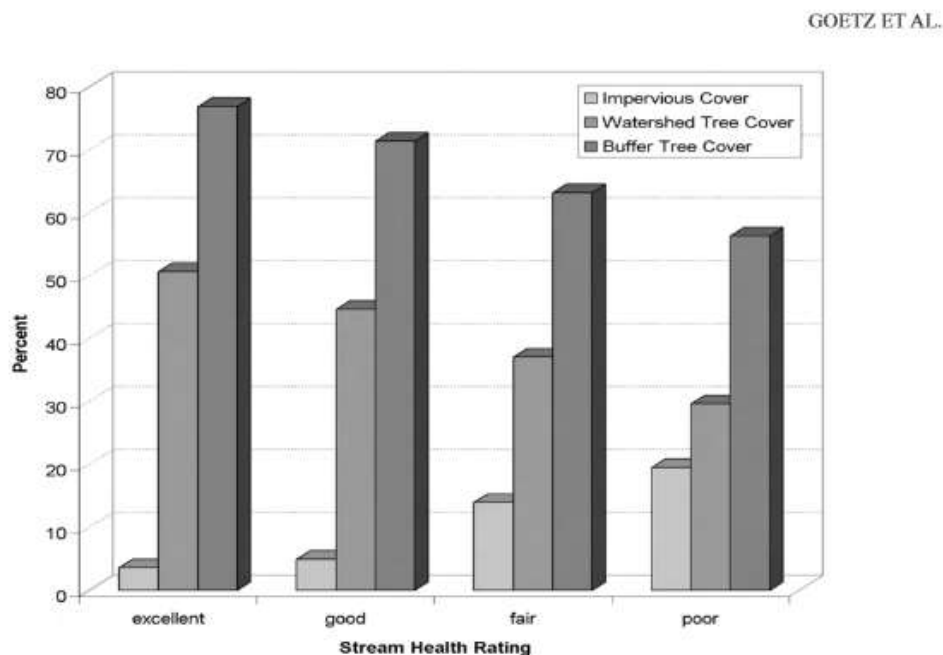


Figure 4. Small watershed stream health rankings in relation to impervious surface cover, watershed tree cover, and riparian buffer zone tree cover.

[Source of above chart: Goetz, Scott J, et al. (2004) Integrated Analysis of Ecosystem Interactions With Land Use Change: The Chesapeake Bay Watershed. *Ecosystems and Land Use Change*, Geophysical Monograph 153. American Geophysical Union. DOI: 10.1029/153GM20]

In 2008, the National Research Council stormwater committee found that “There is a direct relationship between land cover and the biological condition of downstream receiving waters. The possibility for the highest levels of aquatic biological condition exists only with very light urban transformation of the landscape.” (emphasis in the original.)

[National Research Council. 2009. *Urban Stormwater Management in the United States*. Washington, DC: The National Academies Press. <https://doi.org/10.17226/12465>]

The Ten Mile Creek Limited Amendment in 2014 represents a commitment that Montgomery County made to its citizens to protect Ten Mile Creek through science-based caps on imperviousness, and in so doing to protect the clean drinking water supply that is Little Seneca Reservoir.

This proposed site plan by Pulte violates this Master Plan, and if approved, will result in degradation of Ten Mile Creek and increased sediment pollution of Little Seneca Reservoir – so the Planning Board must reject this proposed site plan.